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16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18 SAN FRANCISCO DIVISION

19 WAYMO LLC,  
20 Plaintiff,  
21 v.  
22 UBER TECHNOLOGIES, INC.,  
23 OTTOMOTTO LLC; OTTO TRUCKING LLC,  
24 Defendants.  
25

Case No. 3:17-cv-00939-WHA

**DEFENDANTS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL**

Trial Date: October 2, 2017

1 In accordance with Civil Local Rules 7-11 and 79-5, and General Order No. 62,  
 2 Defendants Uber Technologies, Inc., Ottomotto LLC, and Otto Trucking LLC (“Defendants”)  
 3 submit this motion for an order to file under seal the confidential, unredacted versions of the  
 4 following documents:

- 5 • Highlighted portions of Defendants’ April 24, 2017 Letter Brief to Magistrate  
 6 Judge Corley (“Defendants’ Letter Brief”);
- 7 • Highlighted portions of Exhibits A and C to Defendants’ Letter Brief; and
- 8 • The entirety of Exhibit B to Defendants’ Letter Brief.

9 The redacted portions of Defendants’ Letter Brief, the redacted portions of Exhibits A and  
 10 C thereto, and the entirety of Exhibit B thereto contain information that Plaintiff Waymo LLC has  
 11 designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” in accordance with  
 12 the Patent Local Rule 2-2 Interim Model Protective Order (“Protective Order”), which the parties  
 13 have agreed govern this case (Transcript of 3/16/2017 Hearing, page 6). Although Defendants  
 14 disagree that this information is confidential, Defendants file this instant motion to comply with  
 15 Paragraph 14.4 of the Protective Order.

16 Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the  
 17 documents at issue, with accompanying chamber copies.

18 Defendants served Waymo with this Administrative Motion to File Documents Under  
 19 Seal on April 26, 2017.

20  
 21 Dated: April 26, 2017

MORRISON & FOERSTER LLP

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 23 By: /s/Arturo J. González  
 ARTURO J. GONZÁLEZ

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 26 OTTOMOTTO LLC, and OTTO TRUCKING LLC  
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